

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

WKE'S
GT Co.

REPLY TO:
WASTE MANAGEMENT DIVISION
CADILLAC DISTRICT OFFICE
120 CHAPIN ST W
CADILLAC MI 49601

US EPA RECORDS CENTER REGION 5

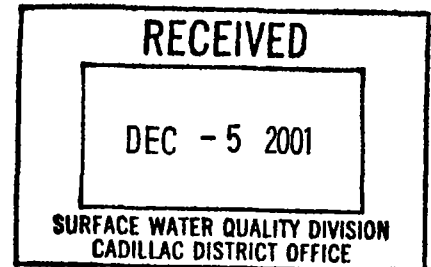


523369

December 5, 2001

Mr. Chris Hubbel
Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, Michigan 48690

Dear Mr. Hubbel:



SUBJECT: Williamsburg Receiving and Storage
State Groundwater Discharge Permit No. M00836

On November 26, 2001, Department of Environmental Quality (DEQ) staff met with you to discuss various issues, including those regarding the State Groundwater Discharge Permit No. M00836 (Permit) issued to Williamsburg Receiving and Storage (WRS). The permit was issued under the authority of Part 31 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, MCL 324.101 et seq. (Part 31) and the rules promulgated under Part 31.

The following outstanding violations are on record and have been referred for escalated enforcement:

1. The provisions of R 323.1157 of the Part 31 rules, effective up to August 30, 2001, states, in part:

"Salt in liquid form shall be diked, curbed, or otherwise structurally enclosed so as to be able to contain a volumetric capacity which is not less than the greatest amount of liquid that can be released from the largest tank within the diked area, assuming a full tank...The area shall be so constructed that no salt can escape there from by gravity through sewers, drains, or otherwise directly or indirectly into any sewer system or to the surface or groundwaters of this state."

Brine pits at WRS do not have secondary containment, as documented by DEQ staff during inspections. As a result, salt has been released to surface waters and groundwater. The lack of secondary containment is in violation of R 323.1157.

December 5, 2001

Administrative Consent Order (Consent Order) to WRS proposing a formal resolution of all compliance issues at your facility. You will be offered the opportunity to confer with staff of the DEQ at that time regarding the draft Consent Order.

At this time, WRS is provided an opportunity to respond to this letter in writing. Please submit any facts or information that you feel you may have regarding the groundwater discharge permit to Ms. Janice Heuer, Environmental Engineer at the Cadillac District Office. You may call her at 231-775-3960 extension 6203, if you have any questions, or you may call me. For your comments to be considered please submit them by no later than December 21, 2001.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip Roycraft", is written over the typed name and title.

Philip Roycraft
Cadillac District Supervisor
Waste Management Division
231-775-3960, Extension 6203

cc: ~~Mr. Mike Stifler, SWQD~~
Mr. Rick Rusz, DEQ, WMD
Mr. Lonnie Lee, DEQ, WMD
Ms. Janice Heuer, DEQ, WMD